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VIA ECF

17 March 2020

The Honorable Valerie E. Caproni United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: *Gabbard v. Clinton*, Case No. 1:20-cv-00558: Joint request for setting a briefing schedule on Defendant Hillary Clinton's motion to dismiss (ECF No. 20)

Dear Judge Caproni:

Plaintiffs Tulsi Gabbard and Tulsi Now, Inc. (collectively, "Gabbard") and Defendant Hillary Clinton jointly write to request setting a briefing schedule on Clinton's motion to dismiss (ECF No. 20), filed on March 13, 2020.

The parties jointly request that the deadline for Gabbard's opposition be set as April 10, 2020, and the deadline for Clinton's reply be set as April 24, 2020.

The current deadline for the opposition is March 27, 2020. The reason for the requested modification to the briefing schedule is due to complications and obligations flowing from the Coronavirus pandemic, among other things.

This is the first request for an extension of time to respond on Clinton's motion to dismiss. It will not affect the progress of this case, as the motion will be fully briefed before the May 1, 2020, status conference in this case.

Respectfully submitted,

Dan Terzian

Counsel for Gabbard

Katherine Turner Counsel for Clinton